



July 1, 2004

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Re: Payphone call Tracking System  
CC Docket 96-128

Dear Ms. Dortch:

Please find enclosed an original and 5 copies of OCMC's SBR System Audit in accordance to Section 64.1310(a)(1). Please file this in CC Docket No. 96-128. Please return a file stamped copy in the enclosed self-addressed stamped envelope.

If you have any questions, please call me.

Very truly yours,

Ann Bernard  
General Counsel

ACB:tah

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**OCMC, INC.**

**SBR System Audit**

To the Board of Directors  
OCMC, Inc.  
Carmel, Indiana

We have examined management's assertion that the implemented Payphone Call Tracking System of OCMC, Inc. accurately tracks payphone calls to completion in accordance with the requirements of Section 64.1310(a)(1) of the Federal Communications Commission CC Docket No. 96-128 set forth in management's Statement of Representation. OCMC, Inc.'s management is responsible for the assertion. Our responsibility is to express an opinion on the assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, management's assertion referred to above is fairly stated, in all material respects, based on conformity with Section 64.1310(a)(1) of the Federal Communications Commission CC Docket No. 96-128 set forth in management's Statement of Representation.

June 30, 2004

*Dunbar, Cook & Shepard, P.C.*

OCMC, Inc.  
SBR System Audit  
Statement of Representation



801 CONGRESSIONAL BOULEVARD  
CARMEL, IN 46032

We represent that our implemented Payphone Call Tracking System accurately tracks payphone calls to completion in accordance with the requirements of Section 64.1310(a)(1) of the Federal Communications Commission CC Docket No. 96-128, as set forth below:

- Our procedures accurately track calls to completion.
- We have a person responsible for tracking, compensating, and resolving disputes concerning payphone completed calls.
- We have effective data monitoring procedures.
- We adhere to the established protocols to ensure that any software, personnel or any other network changes do not adversely affect our payphone tracking ability.
- We have created a compensable payphone call file by matching call detail records against payphone identifiers.
- We have procedures to incorporate call data into required reports.
- We have implemented procedures and controls needed to resolve payphone compensation disputes.
- Our independent third-party auditor can test all critical controls and procedures to verify that errors are insubstantial.
- We have adequate and effective business rules for implementing and paying payphone compensation.

Concerning our compliance, we represent that:

- Our switching platform system identifies payphone 1+ 800 calls and 0+ operator assisted 800 calls by the information digits supplied by Local Exchange Carriers when their calls hit our switching system.
- Our software matches the call information to the billing system data to identify which calls were completed. The software program identifies and flags the calls originating on compensable 800 numbers.

*See auditors' report.*

- An incomplete call is one that has no match in the billing information and is not compensable. Noncompensable 800 numbers are those that were made via an access number, or have contractual commission agreements and are not eligible for per call compensation.
- Payphone service providers who believe they are owed compensation submit, on a quarterly basis, a listing of ANIs for pay phones for which they provide service. We match up these ANIs with the compensable completed calls data obtained above.
- We do not use any clearinghouses for per call compensation transactions.
- The name, address, contact name and phone number of the payphone service provider must be submitted with the list of ANIs for which they provide service. If the payphone service provider is a local exchange carrier, that information must be indicated.

We are responsible for the Payphone Call Tracking System and for our assertion that it accurately tracks payphone calls to completion and complies with Section 64.1310(a)(1) of the Federal Communications Commission CC Docket No. 96-128.

Signed:

Title:

Signed:

Title: